



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 23 2015

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Article Number: 7015 0640 0001 0675 6460

Mr. Anthony Messina, Co-Owner
A. Messina & Sons Properties, LLC
19 Orchard Drive
Gardiner, New York 12588

**RE: Request for Information (“RFI”) Pursuant to Section 308 of the Clean Water Act
Docket No. CWA-IR-16-005
A. Messina & Sons Properties, LLC – 19 Orchard Drive Facility (NYU008129)
Compliance Evaluation Inspection conducted on September 29, 2015**

Dear Mr. Messina:

The United States Environmental Protection Agency (“EPA”) is charged with the protection of human health and the environment under the Clean Water Act (“CWA” or “Act”), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

REQUEST FOR INFORMATION

A. Messina is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA the requested information regarding the subject Facility:

1. Within seven (7) calendar days of receipt of this RFI, A. Messina shall submit to EPA a signed written statement certifying that A. Messina has permanently ceased on-site vehicle and equipment washing and rinsing activities that may result in discharges to the pond or wetland on-site;
2. Within thirty (30) calendar days of receipt of this RFI, A. Messina shall submit to EPA a copy of the Construction General Permit Notice of Intent (“NOI”) and associated finalized Stormwater Pollution Prevention Plan (“SWPPP”); and
3. Within sixty (60) calendar days of receipt of this RFI, A. Messina shall submit to EPA a copy of the State Pollutant Discharge Elimination System (“SPDES”) Individual Permit NOI and associated finalized SWPPP.

Any documents to be submitted by A. Messina as part of this Request for Information shall be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 CFR § 122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All information required to be submitted pursuant to this RFI shall be sent by certified mail or its equivalent to the following address:

Douglas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Enclosed is a copy of the inspection report detailing EPA's findings from the September 29, 2015 inspection at the A. Messina & Sons Properties, LLC Facility located at 19 Orchard Drive in Gardiner, New York. Also enclosed is a copy of EPA's Small Business Resources Information Sheet.

If you have any questions, please feel free to contact Ms. Kimberly McEathron, of my staff, at (212) 637-4228 or via email at mceathron.kimberly@epa.gov.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'DM', with a long horizontal flourish extending to the right.

Douglas McKenna, Chief
Water Compliance Branch

Enclosures

cc: Joseph DiMura, P.E, Director, Bureau of Water Compliance Programs, NYSDEC
Shohreh Karimipour, Regional Water Engineer, NYSDEC Region 3

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

[illegible]

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) A. Messina & Sons Properties, LLC 19 Orchard Drive Gardiner, NY 12588	Entry Time/Date 8:30 AM / 09/29/2015	Permit Effective Date
	Exit Time/Date 10:30 AM / 09/29/2015	Permit Expiration Date
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Anthony Messina, Co-Owner, A. Messina & Sons Properties, LLC, 19 Orchard Drive, Gardiner, NY 12588 Phone: 845-883-6543	Other Facility Data (e.g., SIC NAICS, and other descriptive information) Lat/Long: 41.653037, -74.115.302 SIC: 5093	
Name, Address of Responsible Official/Title/Phone and Fax Number Anthony Messina, Co-Owner, A. Messina & Sons Properties, LLC, 19 Orchard Drive, Gardiner, NY 12588 Phone: 845-883-6543	<div style="text-align: right;"> Contacted <input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No </div>	

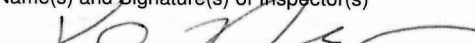

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/>	Permit	<input type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Pretreatment	<input type="checkbox"/>	MS4
<input checked="" type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Compliance Schedules	<input checked="" type="checkbox"/>	Pollution Prevention		
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water		
<input type="checkbox"/>	Effluent/Receiving Waters	<input type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	Combined Sewer Overflow		
<input type="checkbox"/>	Flow Measurement	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Sanitary Sewer Overflow		

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	See attached inspection report.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
	USEPA/DECA-WCB/212-637-4228	11/6/2015
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	USEPA/DECA-WCB/212-637-4268	11/20/15

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	! Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B ---- EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L ---- Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, NY, NY 10007

COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: A. Messina & Sons Properties, LLC	
Inspection Date: September 29, 2015	EPA Inspector: Kimberly McEathron, Physical Scientist, USEPA Region 2, (212) 637-4228
Inspection Time: 8:30 AM – 10:30 AM	
On-Site Representative: Anthony Messina, Co-Owner, A. Messina & Sons Properties, LLC, (845) 883-6543	
Site Information: Lat / Long: 41.653037, -74.115302 A. Messina & Sons Properties, LLC 19 Orchard Drive Gardiner, NY 12588 SPDES/ICIS No. NYU008129	
SIC Code: 5093 – Scrap and Waste Materials	

INTRODUCTION:

On September 29, 2015, the United States Environmental Protection Agency (EPA) conducted a Compliance Evaluation Inspection (CEI) at the A. Messina & Sons Properties, LLC owned and operated scrap metal facility located at 19 Orchard Drive in Gardiner, Ulster County, New York ("Facility" or "Site"). Mr. Anthony Messina, Co-Owner was present at the time of the inspection and represented the Facility. Ms. Kimberly McEathron, of EPA Region 2, led the CEI and conducted a Site walk-through. Weather conditions at the time of the CEI were sunny, dry and approximately 70°F.

Facility Description

The thirty (30) acre property includes the approximately three (3) to four (4) acre Facility owned and operated by A. Messina & Sons Properties, LLC which is a family-run scrap metal recycling facility that has been in operations for approximately 45 years. According to on-site representatives, the Facility accepts scrap metal from the public but does not accept hazardous materials, refrigerators, propane tanks or automobiles. Scrap metal is processed at the Facility by sorting into stock piles and/or roll off containers which are then loaded onto a truck for delivery to a scrap metal broker, Rensselaer Iron & Steel in Rensselaer, NY. The processing area is paved, located in the center of the Facility and is approximately 80 feet by 300 feet. At the time of the inspection, uncovered aluminum and steel stockpiles were observed in the processing area as well as a stack of empty 55-gallon drums (see photographs DSCN5334.JPG – DSCN5337.JPG). The driveway and parking area along the west side of the Facility consists of crushed shale and is unpaved. The Facility includes an office, a scale north of the office and a maintenance garage where maintenance is performed on trucks, equipment and vehicles, including oil changes (see photographs DSCN5317.JPG – DSCN5323.JPG). The Facility operates under Standard Industrial Classification (SIC) Code 5093 – Scrap and Waste Materials.

At the time of the inspection, EPA inspector McEathron observed that the ground was wet extending from the south wall of the maintenance garage to the pond with a hose, spray canister and detergent located in this area (see photographs DSCN5326.JPG – DSCN5331.JPG). According to the on-site representatives, vehicles and equipment are hosed off at this location to remove dirt and personal vehicles have been washed at this location using detergent. At the time of the inspection, the on-site representative stated that the vehicle rinsing and washing activities at this location will cease immediately, however, this has not been confirmed or certified in writing.

Drainage Systems and Stormwater Discharges

At the time of the inspection, EPA inspector McEathron did not observe catch basins, inlets, drainage swales or ditches on-site or along the driveway or in the immediate area along Orchard Drive (see photographs DSCN5354.JPG – DSCN5356.JPG). EPA inspector McEathron observed a pond on-site located immediately south of the maintenance garage (DSCN5331.JPG – DSCN5332.JPG). At the time of the inspection, EPA inspector McEathron observed stagnant water in the pond and a low point located at the south of the pond where there were areas lacking vegetative growth and appeared to be an overland spillway into a forested wetland (see photographs DSCN5343.JPG – DSCN5345.JPG). Based on observations at the time of the inspection and on-site representatives, there were no piped connections to the pond or wetland on-site. At the time of the inspection, EPA inspector McEathron walked through and along the forested area south of the Site and did not observe standing water in the forested area but did observe phragmites and cat tails (see photographs DSCN5345.JPG – DSCN5349.JPG). According to on-site representatives and topographic maps, the forested area south of the Site is a wetland, NYSDEC Freshwater Wetland CD-23, which extends south and drains to an unnamed tributary. At the time of the inspection, EPA inspector McEathron observed a culvert pipe under Orchard Drive approximately 1,900 feet south of the Facility with a drainage swale extending from the general area south of the wetland and then west approximately 1,000 feet into an unnamed north-flowing tributary to the Wallkill River (see photographs DSCN5357.JPG – DSCN5362.JPG).

Stormwater runoff from the paved processing area generally pools or flows south and then east into the pond on-site via overland runoff. Stormwater runoff from the unpaved parking area located south of the maintenance garage generally flows north and then east to the pond on-site via overland runoff. Stormwater runoff from the unpaved driveway infiltrates or flows north into a forested area via overland runoff.

At the time of the inspection, EPA inspector McEathron observed one (1) floor drain in the garage which appeared to be sealed (see photograph DSCN5324.JPG). According to the on-site representatives, the floor drain in the garage had been plugged but previously discharged to the pond on-site.

Planned Construction and Facility Changes

According to on-site representatives, the Facility has been working with NYSDEC Region 3, the Town of Plattekill and a contract engineer, Mr. Anthony Meluso, P.E. of Gardiner Engineering, PC to implement planned improvements at the Facility. The planned work includes the construction of an 80 foot x 160 foot x 35 foot high roofed warehouse which would house the processing area with the sorting piles and material storage indoors. The roofed warehouse would be located in place of the current processing area. In addition, the Facility plans on expanding and reconfiguring the slope of the paved area with a curb along the south side. The design would direct stormwater flows to an oil and water separator which would then discharge towards the wetland area. At the time of the inspection, the Facility representative stated that the goal is to complete construction in the spring of 2016.

According to a letter dated August 19, 2013, Mr. James J. Eldred, Division of Environmental Permits, NYSDEC Region 3, reviewed the proposed site plans and offered comments including that the Facility is

required to obtain a freshwater wetland permit and may be required to obtain coverage under the MSGP and Construction General Permit. According to the Facility's contract engineer, the Facility will be applying for Construction General Permit coverage for stormwater discharges associated with construction of the warehouse and site work and will be applying for individual SPDES permit coverage for the oil and water separator associated discharges. On September 30, 2015, Mr. Meluso provided EPA with a copy of the Facility's Stormwater Pollution Prevention Plan (SWPPP) for Construction Activities dated September 19, 2013. According to the SWPPP, the total soil disturbance resulting from the project will be approximately 2.44 acres. According to the SWPPP, a series of catch basins and manholes will divert stormwater from the Site to the oil/water separator and then to a turbidity box and will then be discharged to the existing pond via Outfall 001. According to the SWPPP, the wetland eventually discharges into the Wall Kill River.

POTENTIAL NONCOMPLIANCE ITEMS:

At the time of the inspection, EPA inspector McEathron identified the following at the Facility:

1. At the Facility, A. Messina & Sons Properties, LLC conducts industrial activity under Standard Industrial Classification (SIC) Code 5093 – Scrap and Waste Materials and falls under Sector N: Scrap and Waste Recycling Facilities, and therefore, is regulated under 40 C.F.R. § 122.26 and NYSDEC SPDES permits;
2. Stormwater runoff from the Facility flows into a pond on-site which overland flows into NYSDEC Freshwater Wetland CD-23 which then flows to a tributary to the Wallkill River;
3. According to the on-site representatives, vehicles and equipment are hosed off adjacent to the pond to remove dirt and personal vehicles have been washed at this location using detergent; and
4. At the time of the inspection, A. Messina & Sons Properties, LLC did not have coverage for the Facility under the NYSDEC SPDES Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity ("MSGP" or "Permit"), an individual SPDES permit, nor had the Facility submitted No Exposure Certification, at the time of the inspection.

ATTACHMENTS:

Photograph Log
Photographs

PHOTOGRAPH LOG:

Photograph Log – A. Messina & Sons Properties LLC CEI Unedited Photographs Taken September 29, 2015 by Kimberly McEathron with Nikon Coolpix AW 100V1.0	
DSCN5317.JPG	Scale adjacent to the office
DSCN5318.JPG	Storage and bins west of the office
DSCN5319.JPG	Storage and processing/sorting and loading area in the center of the Facility
DSCN5320.JPG	Office
DSCN5321.JPG	Garage
DSCN5322.JPG	Battery storage in garage
DSCN5323.JPG	Containers and storage in garage
DSCN5324.JPG	Closed floor drain in garage
DSCN5325.JPG	Garage
DSCN5326.JPG	Steel storage along south side of garage just north of the pond
DSCN5327.JPG	Hose in vehicle wash area along south side of garage just north of the pond
DSCN5328.JPG	Wet gravel in the vehicle wash area towards pond
DSCN5329.JPG	Wet gravel in the vehicle wash area towards pond
DSCN5330.JPG	Grass between pond and vehicle wash area

DSCN5331.JPG	View of the southwest corner of the pond
DSCN5332.JPG	View of the east side of the Pond
DSCN5333.JPG	Detergent in the vehicle wash area adjacent to the pond
DSCN5334.JPG	Storage and processing/sorting and loading area in the center of the Facility
DSCN5335.JPG	Aluminum and steel storage piles in the center of the Facility
DSCN5336.JPG	Dumpsters and 55-gallon drums in the western portion of the Facility
DSCN5337.JPG	Western portion of the Facility (view facing south)
DSCN5338.JPG	Western portion of the Facility (view facing west)
DSCN5339.JPG	Northwest portion of the Facility
DSCN5340.JPG	Northwest portion of the Facility
DSCN5341.JPG	Dumpsters in northwest portion of the Facility
DSCN5342.JPG	View of the sorting portion of the Facility from the west
DSCN5343.JPG	Forested area south of the Facility
DSCN5344.JPG	Forested area west of the pond
DSCN5345.JPG	Southwest corner of the pond
DSCN5346.JPG	Forested area west of the pond
DSCN5347.JPG	ATV trail into the forested area south of the Facility
DSCN5348.JPG	Forested area south of the Facility
DSCN5349.JPG	Forested area southwest of the Facility
DSCN5350.JPG	Trail west of the Facility heading south
DSCN5351.JPG	Forested area southwest of the Facility
DSCN5352.JPG	Trail west of the Facility heading south
DSCN5353.JPG	End of defined trail south of the Facility heading east
DSCN5354.JPG	East side of Orchard Drive view facing south at Facility driveway
DSCN5355.JPG	Gravel driveway into facility from Orchard Drive
DSCN5356.JPG	East side of Orchard Drive view facing north at Facility driveway
DSCN5357.JPG	Culvert pipe under Orchard Drive near house #58, south of Facility (off-site)
DSCN5358.JPG	Downstream/west side of channel (off-site)
DSCN5359.JPG	Downstream/west side of channel (off-site)
DSCN5360.JPG	Upstream side of channel (off-site)
DSCN5361.JPG	Upstream side of channel (off-site)
DSCN5362.JPG	Upstream side of channel (off-site)
DSCN5363.JPG	House #58, south of Facility (off-site)
DSCN5364.JPG	Two pipe culverts and stream under Anderson Road south of Facility (view upstream) (off-site)
DSCN5365.JPG	Two pipe culverts and stream under Anderson Road south of Facility (view upstream) (off-site)



DSCN5317



DSCN5318



DSCN5319



DSCN5320



DSCN5321



DSCN5322



DSCN5323



DSCN5324

A. Messina 9/29/2015 CEI Photographs



DSCN5325



DSCN5326



DSCN5327



DSCN5328



DSCN5329



DSCN5330



DSCN5331



DSCN5332

A. Messina 9/29/2015 CEI Photographs



DSCN5333



DSCN5334



DSCN5335



DSCN5336



DSCN5337



DSCN5338



DSCN5339



DSCN5340

A. Messina 9/29/2015 CEI Photographs



DSCN5341



DSCN5342



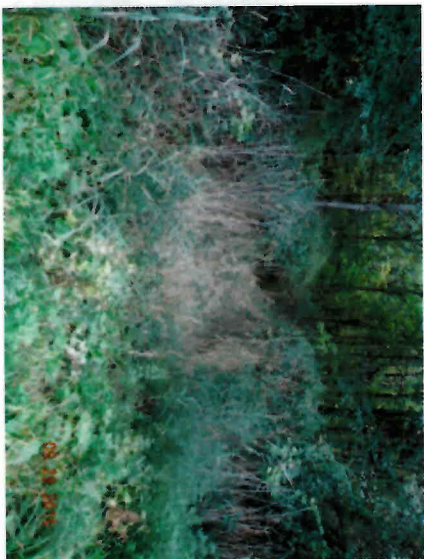
DSCN5343



DSCN5344



DSCN5345



DSCN5346



DSCN5347



DSCN5348

A. Messina 9/29/2015 CEI Photographs



DSCN5349



DSCN5350



DSCN5351



DSCN5352



DSCN5353



DSCN5354



DSCN5355



DSCN5356

A. Messina 9/29/2015 CEI Photographs



DSCN5357



DSCN5358



DSCN5359



DSCN5360



DSCN5361



DSCN5362

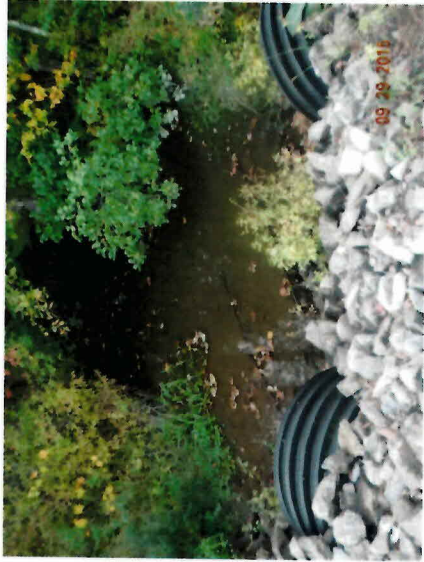


DSCN5363



DSCN5364

A. Messina 9/29/2015 CEI Photographs



DSCN5365

